

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GABRIELA NIEVES,)
)
Plaintiff,)
)
v.) Cause No. 1:20-cv-00320-JMS-DML
)
CARMEL CLAY SCHOOLS,)
)
Defendant.)

**PLAINTIFF'S MOTION FOR DISCOVERY CONFERENCE
IN RELATION TO NON-PARTY RAY LAWRENCE'S MOTION TO QUASH**

Comes now Plaintiff Gabriela Nieves, by counsel, and respectfully moves for a discovery conference with the Magistrate Judge to discuss matters related to the Motion to Quash filed by Non-Party Ray Lawrence, and in support thereof, states as follows:

- 1) The matter has been fully briefed, but some additional information has come to Ms. Nieves' attention that is related to the Declarations filed by Mr. Lawrence in support of his Motion and Response.
- 2) Given the limited time remaining for discovery (a Motion to extend is pending, but the current deadline is June 30, 2021), Ms. Nieves believes that a telephonic, on-the-record discovery conference will be the most efficient means of addressing the issue.
- 3) Such a conference would also permit the participation of another lawyer, Mr. Jim Dawson of Taft Stettinius & Hollister LLP, who has information critical to the

Court's accurate assessment of Mr. Lawrence's Motion. Mr. Dawson is the attorney for a Jane Doe victim of Mr. Lawrence.

4) Counsel for Defendant Carmel Clay and Non-Party Ray Lawrence have been advised of this Motion. Counsel for Carmel Clay does not object to the relief sought herein. As of the filing of this Motion, counsel for Non-Party Ray Lawrence has not yet responded to the inquiry (sent via email; two attempts were also made to contact counsel by telephone (one to Ms. Blevins, one to Ms. Endwright)).

WHEREFORE Ms. Nieves prays that the Court will schedule a telephonic, on-the-record discovery conference to discuss matters related to Mr. Lawrence's Motion to Quash, and for all other relief just and proper in the premises.

Respectfully submitted,

s/ Jonathan Little
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CERTIFICATE OF SERVICE

I certify that the foregoing Motion was filed on April 28, 2021 using the Court's CM/ECF System. Service will be made on all counsel of record by operation of the same. I further certify that a courtesy copy was sent to Jim Dawson via email at jdawson@taftlaw.com.

s/ Jonathan Little
Jonathan Little